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Attorneys for PLAINTIFFS

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

DAVID HAKIM, an individual; SAN
JULIAN DISCOUNT MART, INC., a
California Corporation, f/b/n
MURANO HOME FURNISHING; and
Mybecca, Inc., a California
Corporation;
Plaintiff,

v.

MURANO, INC., a California
Corporation, a/k/a URBAN MALL;
MURANO SHADES, INC., a
California Corporation; MURANO
WORLD IMPORTS, a business of
unknown formation; BAHRAM
DADBIN, a/k/a DANNY DADBIN
a/k/a DANNY MURANO, an
individual; JASON DADBIN, an
individual; JOSHUA DADBIN, an
individual; and DOES 1 through 20,
inclusive,

Defendants.

Case No. 2:15-cv-5633 JVS-(PLAx)

The Honorable James V. Selna

**DECLARATION OF DREW H.
SHERMAN IN SUPPORT OF
PLAINTIFFS' *EX PARTE*
APPLICATION FOR AN ORDER
ALLOWING PLAINTIFFS'
MOTION TO EXCEED 25 PAGES**

Complaint Filed: July 24, 2015

1 I, Drew H. Sherman, declare:

- 2 1. I am an attorney at law, duly licensed to practice law in the State of
3 California. I am senior counsel of Adli Law Group, P.C., attorneys of record
4 for Plaintiff, *Hakim v. Murano Inc.*, Case No. 2:15-cv-5633 MMM-(PLAx).
5 I have personal knowledge of the facts set forth in this Declaration and, if
6 called as a witness, could and would testify competently to such facts under
7 oath.
- 8 2. I make this declaration in support of Plaintiffs' *ex parte* application for an
9 order allowing their motion for reconsideration to exceed 25 pages.
- 10 3. I drafted the proposed motion for reconsideration at issue in this *ex parte*,
11 and in order to properly show this Court Plaintiffs' positions and reasoning,
12 I could not whittle the memorandum down to less than 34 pages.
- 13 4. **Attached hereto, and incorporated herein by reference, as Exhibit A** is
14 a true and correct copy of the Plaintiffs' proposed Motion for
15 Reconsideration with the extra pages.
- 16 5. **Attached hereto, and incorporated herein by reference, as Exhibit B** is
17 a true and correct copy of my declaration with exhibits to the Plaintiffs'
18 proposed Motion for Reconsideration with the extra pages.
- 19 6. On October 22, 2017, I emailed Defendants' counsel and inquired if he
20 would be opposing this *ex parte* motion to request an order to allow
21 Plaintiffs' motion for reconsideration to exceed 25 pages, pursuant to L.R.
22 7-3.
- 23 7. Defendants' counsel stated Defendants would be opposing this *ex parte*.

24 I declare under penalty of perjury and the laws of the United States of America
25 that the foregoing is true and correct.

26 Executed this 23rd day of October, 2017 in Los Angeles California

27 By: /s/Drew Sherman

28 Drew H. Sherman

CERTIFICATE OF SERVICE

I am over eighteen (18) years of age, employed in the County of Los Angeles, and not a party to this action. My business address is 444 South Flower Street, Suite 3100, Los Angeles, California 90071. I hereby certify that on October 23, 2017, I served the following documents:

Participants in the case who are registered CM/ECF users will be served by the CM/ECF System.

**DECLARATION OF DREW H. SHERMAN IN SUPPORT OF PLAINTIFFS'
EX PARTE APPLICATION FOR AN ORDER ALLOWING PLAINTIFFS'
MOTION TO EXCEED 25 PAGES**

By delivering the document(s) to:

Jeff Spellerberg
The Law Offices of Jeff Spellerberg
8200 Wilshire Blvd, Suite 415
Beverly Hills, CA 90211

I declare, under penalty of perjury under the laws of the United States, that the foregoing is true and correct. Executed October 23, 2017 at Los Angeles, California.

/s/Drew H. Sherman
Drew H. Sherman